

## **Ponderay Newsprint Company**

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April 4, 2017

Mr. Deane Osterman Executive Director, Kalispel Natural Resources Attention: Air Quality Comments P.O. Box 39 Usk,WA 99180-0039

RE: Kalispel Indian Reservation Prevention of Significant Deterioration Program Class I Redesignation Proposal

Dear Mr. Osterman:

Ponderay Newsprint Company (PNC) appreciates the opportunity to comment on the Kalispel Tribe's proposal to redesignate the Kalispel Reservation as a Class I area under the Clean Air Act Prevention of Significant Deterioration program. PNC has always been, and continues to be, committed to protection of our air quality.

However, we do have concern over the impacts that would result from a Class I designation of the Kalispel Indian Reservation. PNC believes that this redesignation could limit our ability to modernize operations at the mill and make manufacturing improvements, as well as limit the ability to attract other businesses to locate in Pend Oreille County. PNC urges the Tribe to consider these factors that the redesignation could have on PNC and the local community.

In addition, it is important to recognize that the PSD program is a technically complex and resource intensive regulatory scheme. Using the PSD program to protect tribal air quality would require a significant investment of tribal resources in consulting services and interaction with state and federal regulatory agencies. If the Reservation becomes a Class I area many interest groups other than the Tribe will acquire the ability to enforce the requirements of the program.

PNC believes that redesignation may not be necessary to achieve the Tribe's goals and would welcome the opportunity to meet with the Tribe to discuss optional means to achieve the Tribe's air quality protection goals without stifling growth in the region. If the Tribe is interested in pursuing this discussion please contact our environmental manager Laura Verity at 509-445-2304.

Sincerely,

Myron Johnson

Ponderay Newsprint General Manager

Cc: Maia Bellon, Washington Department of Ecology, Director Grant Pfeifer, Washington Department of Ecology, Eastern Region Office, Director Karen Skogg, Pend Oreille County Commissioner, Board Chair Steve Kiss, Pend Oreille County Commissioner Mike Manus, Pend Oreille County Commissioner Greg Snow, Pend Oreille County Director of Community Development Gregg Dohrn, Pend Oreille County Community Development Consultant Rhonda Cary, Pend Oreille County Clerk of the Board